

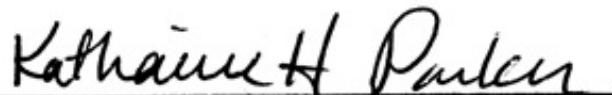
GOTLIB LAW

May 30, 2023

Via ECF & Email

The Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
40 Foley Square
New York, New York 10007
(Email: Parker_NYSDChambers@nysd.uscourts.gov)

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.

05/30/2023

Re: United States v. Gumucio, et al. (Haven Soliman), 22 MAG 6904 (SN)

Dear Judge Parker:

Carla Sanderson and I represent Haven Soliman in the above captioned case. I write, with the consent of the government and the U.S. Pretrial Services Office (“Pretrial”), to respectfully request that the terms of Ms. Soliman’s bond be temporarily modified to permit her to travel to the District of Colorado, and points in between for travel, from June 3 through June 8, 2023.

Ms. Soliman was arrested on August 31, 2022 on a criminal complaint alleging criminal tax violations. Ms. Soliman was released on bond, on consent of the government, that same day. Ms. Soliman’s conditions of release include, among others, her travel restricted to the Southern and Eastern Districts of New York, the Western District of Washington, the District of Oregon and points in between for travel to and from the permitted districts. Ms. Soliman has complied with all the conditions of her pretrial release to date.

The requested temporary travel modification would allow Ms. Soliman to attend company training required for a promotion in her employment. While the position is primarily remote, they have asked her to attend training at the office in Colorado during the requested dates as a prerequisite for her promotion. I have provided information regarding the details of Ms. Soliman’s travel to the government and Pretrial. The government (by Assistant U.S. Attorney Michael Neff) consents to this request as does Pretrial Officer Chandra Wageman (through her supervisor Patrick Robertson).

Accordingly, we respectfully request that the Court modify the terms of Ms. Soliman’s pretrial release to permit her to travel to the District of Colorado and points in between for travel from June 3 through June 8, 2023. I thank the Court for its consideration.

Respectfully submitted,

/s/

Valerie A. Gotlib

cc: Arraignment Clerks (*via Email*)
Michael Neff, Assistant U.S. Attorney (*via Email*)
Chandra Wageman, U.S. Pretrial Officer (*via Email*)